

LITE DEPALMA GREENBERG & AFANADOR, LLC

Joseph J. DePalma
Catherine B. Derenze
570 Broad Street, Suite 1201
Newark, NJ 07102
Tel: (973) 623-3000
Fax: (973) 623-0858
jdepalma@litedepalma.com
cderenze@litedepalma.com

*Interim Liaison Counsel for Producer
Indirect Purchaser Plaintiffs*

IN RE: FRAGRANCE INDIRECT PURCHASER
ANTITRUST LITIGATION

:
: Civil Action No.: 23-3249 (WJM)(JSA)
:
: **NOTICE OF MOTION FOR PRO HAC VICE**
: **ADMISSION OF DAVID M. CIALKOWSKI**
: **AND IAN F. MCFARLAND**
:
:

PLEASE TAKE NOTICE that on April 15, 2024 at 10:00 a.m., or as soon thereafter as counsel may be heard, Interim Liaison Counsel for Producer Indirect Purchaser Plaintiffs (“Plaintiffs”) will move before Honorable Jessica S. Allen, U.S.M.J. at the United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jers07101, for an order admitting David M. Cialkowski and Ian F. McFarland *pro hac vice* for all purposes in the above-captioned matter; and it appearing that David M. Cialkowski is a partner with the law firm Zimmerman Reed LLP, located at 1100 IDS Center, 80 South 8th Street, Minneapolis, Minnesota 55402 and Ian F. McFarland is an associate of the law firm Zimmerman Reed LLP, located at 1100 IDS Center, 80 South 8th Street, Minneapolis, Minnesota 55402.

PLEASE TAKE FURTHER NOTICE that in support of Plaintiffs’ motion are the Certifications of Joseph J. DePalma, David M. Cialkowski and Ian F. McFarland.

PLEASE TAKE FURTHER NOTICE A proposed form of Order is also submitted

herewith.

PLEASE TAKE FURTHER NOTICE that because this application being made is pursuant to Local Rule 101.1(c) and is within the discretion of the Court, no brief is necessary.

PLEASE TAKE FURTHER NOTICE that counsel for Defendants have advised that they consent to the *pro hac vice* admission of the above-named counsel; and for good cause having been shown;

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby requests that this motion be decided on the papers pursuant to Rule 78 of the Federal Rules of Civil Procedure.

LITE DEPALMA GREENBERG & AFANADOR, LLC

Dated: March 25, 2024

/s/ Joseph J. DePalma
Joseph J. DePalma
Catherine B. Derenze
570 Broad Street, Suite 1201
Newark, NJ 07102
Tel: (973) 623-3000
Fax: (973) 623-0858
jdepalma@litedepalma.com
cderenze@litedepalma.com

LITE DEPALMA GREENBERG & AFANADOR, LLC

Mindee J. Reuben
Steven J. Greenfogel
1515 Market Street, Suite 1200
Philadelphia, PA 19102
Tel: (267) 519-8306
Fax: (973) 623-0858
mreuben@litedepalma.com
sgreenfogel@litedepalma.com

GUSTAFSON GLUEK PLLC

Daniel E. Gustafson
Daniel C. Hedlund
Michelle J. Looby
Frances Mahoney Mosedale
Bailey Twyman-Metzger
120 South Sixth Street, Suite 2600

Minneapolis, MN 55402
Tel: (612) 333-8844
Fax: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
fmahoneymosedale@gustafsongluek.com
btwymanmetzger@gustafsongluek.com

GUSTAFSON GLUEK PLLC

Dennis J. Stewart
600 West Broadway, Suite 3300
San Diego, CA 92101
Tel: (619) 595-3299
Fax: (612) 339-6622
dstewart@gustafsongluek.com

*Attorneys for Interim Liaison Counsel
for Producer Indirect Purchaser Plaintiffs*